



ATTACHMENT 1  
COMMENTS TO THE CABRILLO PORT LIQUEFIED NATURAL GAS DEEPWATER PORT PROJECT DRAFT EIS/EIR  
FEDERAL DOCKET # USCG 2004-16877  
STATE CLEARINGHOUSE # 2004021107

Submitted Electronically to USCG and CSLC 12/17/2004

Page	Line No.	Subject	Statement	Correction	Comment
G484-97 (cont'd)			<ul style="list-style-type: none"><li>No pets or firearms would be permitted on the Project site;</li><li>Pipeline workers would be informed regarding the importance of maintaining designated protected areas;</li><li>In habitats that potentially support listed species or sensitive habitat, orange construction fencing would be installed to delineate the work area in order to prevent equipment from entering adjacent habitat areas.</li></ul>	<ul style="list-style-type: none"><li>No pets or firearms would be permitted on the Project site; [incorporate into TerrBio-2c EEAP and delete this measure.]</li><li>Pipeline workers would be informed regarding the importance of maintaining designated protected areas; [Redundant with TerrBio-2c EEAP.]</li><li>In habitats that potentially support listed species or sensitive habitat, orange construction fencing would be installed to delineate the work area in order to prevent equipment from entering adjacent habitat areas. [REDUANT with flagging/markings/avoidance required in MM TerrBio-3c, TerrBio-3b, TerrBio-2e, and TerrBio-2a]</li></ul>	protected resources and Staying within the ROW and on approved access roads are topics that would be addressed in the EEAP (AMM TerrBio-2c) and does not require a separate and redundant mitigation measure such as TerrBio-7b. 3. Flagging, marking and avoidance of resources is a requirement identified in 4 different mitigation measures. Please combine the requirement into a single mitigation measure and delete the various other references contained within the other measures [TerrBio-3c, -3b, -2e, -2b]. Exclusionary fencing around the resource is a more appropriate than "orange construction fencing" (typically that is a safety fence) along the ROW, however, flagging the resource for avoidance is an adequate delineation method.
G484-98	19-25	Impact TerrBio-8, Temporary Wildlife Disturbance from Increased Human Presence	Pipeline repairs would have impacts similar to construction impact, but they would be more localized. .... Significant effects of constructions and repair operations could be avoided by implementation of the mitigation measures described below. To minimize impacts on pickleweed habitat, HDD bore pits should not be located within wetlands. Impacts on pickleweed habitat would require a 3:1 replacement ratio, plus additional surface restoration, which may include noxious weed control.	Pipeline repairs would have impacts similar to construction impact, but they would be more localized. .... Significant effects of constructions and repair operations could be avoided by implementation of the mitigation measures described below. To minimize impacts on pickleweed habitat, HDD bore pits should not be located within wetlands to the greatest extent possible. Impacts to pickleweed and other wetland habitats would require a 3:1 replacement ratio, plus additional surface restoration, which may include noxious weed control, be mitigated pursuant to the terms and conditions of the applicable State and Federal permits.	On-going operation and maintenance activities are not the subject of this permit process. O&M activities would be permitted separately and on a case-by-case basis specific to each activity.
G484-99	18-21	Mitigation Measures for Impact TerrBio-9, Temporary or Permanent Construction Impacts on Sensitive Species and/or Habitats	To minimize impacts on pickleweed habitat, HDD bore pits should not be located within wetlands. Impacts on pickleweed habitat would require a 3:1 replacement ratio, plus additional surface restoration, which may include noxious weed control.	The terms and conditions of mitigation measures and habitat compensation measures for wetlands should be determined by the resource agencies responsible for issuing the applicable permits.	
G484-100	23-26	MM TerrBio-9b, Protect Special Status Wildlife	Where construction occurs within or near known or potential special status species habitat, the Applicant shall perform the actions defined in the following paragraphs	Where construction occurs within or adjacent to known or potential special status species habitat, SoCalGas the Applicant shall perform the actions defined in the following paragraphs.....	SoCalGas is not the applicant. The mitigation measures should apply to known suitable special status species habitat. The word "potential" is improperly applied in this

G484-98

Section 4.8.4 has been revised.

G484-99

Section 4.8.4 has been revised. However, the 3:1 ratio minimum for habitat acreage replacement has been incorporated into the mitigation measures for temporary or permanent impacts on rare and special status plants during construction, operation, and maintenance.

G484-100

Section 4.8.4 has been revised.



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4.8-53	37-41	MM TerriBlo-9c, Protect Specified Bird Species	Where construction is proposed to occur near riparian or marsh habitats that support special status bird species, the Applicant shall limit construction periods to times outside the respective breeding season of the affected species through the following: ....	Where construction is proposed to occur near riparian or marsh habitats that support special status bird species, the Applicant and SoCalGas will consult with USFWS and CDFG to determine the appropriate mitigation measures that limit construction periods to times outside the respective breeding season of the affected species through the following: .... [DELETE REMAINING MEASURE]	context.  The mitigation as written does not provide for protection of state and federally-listed species, and the mitigation as written contradicts Bullet #1 that provides for construction during breeding season. It is infeasible to limit construction to September 1 through January 31 (5 months) of the year. As a public utility, SoCalGas operates year-round to provide an essential service to the public. Consequently, SoCalGas regularly consults with USFWS and CDFG regarding appropriate mitigation measures to avoid impacts to breeding birds.
4.8-54 6-60	17-19	MM TerriBlo-9c, Protect Specified Bird Species	If active nests are found, a 500-foot (152-m) no-disturbance buffer shall be established around the active nest (s).	If construction activities are determined to adversely affect active nests are found, a species-specific 500-foot (152-m) no-disturbance buffer shall be established around the active nest (s) until the young have fledged.	Certain species of birds are more tolerant to noise and disturbance, SoCalGas proposes that the species-specific buffer would be determined by a qualified biologist based on site-specific conditions and observed behaviors of the nesting bird(s). Furthermore, the majority of the project is associated with developed areas characterized by existing high levels of traffic and persistent human, noise and ground disturbances.
4.8-54	24-27	MM TerriBlo-9c	If construction activities were to occur within agricultural fields of the Oxnard Plain during winter, surveys would have to be completed to identify over-wintering that may occur along the pipeline routes.	If construction activities were to occur within agricultural fields of the Oxnard Plain during winter (provide dates), surveys would have to be completed to identify special status over-wintering birds that may occur along the pipeline routes.	Identify the dates of the construction timeframe that would require surveys for special-status over-wintering birds.
4.8-56	32-33	Impact Analysis and Mitigation	The river crossings support southern cottonwood-willow riparian habitat, and the entire route lies within the California Orcutt grass ( <i>Orcuttia californica</i> ) habitat	The river crossings support southern cottonwood-willow riparian habitat, and the entire route lies within the California Orcutt grass ( <i>Orcuttia californica</i> ) habitat.	California Orcutt grass should be eliminated from further consideration as a species that could be impacted by the proposed project. Suitable habitat, soils or hydrology to support the presence of this vernal pool

G484-101

G484-102

G484-103

G484-104

- G484-101  
Section 4.8.4 has been revised.
- G484-102  
Section 4.8.4 has been revised.
- G484-103  
Section 4.8.4 has been revised.
- G484-104  
Section 4.8.4 has been revised.



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G484-104 (cont'd)					species are not present in the immediate project vicinity.
G484-105	4.8-57	Impact Analysis and Mitigation	Impacts on the sage scrub, the riparian habitat at the river crossings, and the oak woodlands, would be long term.	Impacts on the sage scrub, the riparian habitat at the river crossings, and the oak woodlands, although temporary, would be long term depending upon the success of site restoration.	The temporal scale of impacts is dependent on the type of impact (vegetation trimming or crushing versus removal by grubbing) and the success of on-site restoration efforts or the impacts would be offset by acquisition of mitigation land at an appropriate conservation bank.
G484-106	4.8-57	Impact Analysis and Mitigation	CDFG is not issuing "take permits" for the stickleback population within the Santa Clara River. USFWS and CDFG may be amenable to an HDD crossing, although there would be concerns regarding releases of drilling muds within the river. The trenching method to install the pipe across the Santa Clara River would not be acceptable. Therefore, the Applicant's preferred option to install the pipeline across the river include is by open girder bridge.	CDFG is not issuing "take permits" for the stickleback population within the Santa Clara River. USFWS and CDFG may be amenable to an HDD crossing, although there would be concerns regarding releases of drilling muds within the river. The trenching method to install the pipe across the Santa Clara River would not be acceptable. Therefore, the Applicant's preferred option to install the pipeline across the river include is by open girder bridge.	No formal consultation with the resource agencies to discuss the proposed action has occurred. Therefore, statements such as "USFWS and CDFG may be amenable" are not supported by fact and could be misleading.
G484-107	4.9-2	Native American Values			Please cite the specific regulatory requirement that defines these Native American values and requires their preservation by law.
G484-108	4.9-21 6-63	AMM Cui-2b, Native American Values	Avoidance of adverse impacts to oak trees and other plants and animals of local Native American concern. Impacts to native plants would be minimized by allowing collection of herbs before construction and be relocating and replanting grasses; and if resource location is unavoidable during construction or maintenance of the FSRU and pipeline, further investigations in the form of complete documentation and possible excavation and/or data recovery	Avoidance of adverse impacts to oak trees and other plants and animals of local Native American concern. Impacts to native plants would be minimized by allowing collection of herbs before construction and be relocating and replanting grasses; and if resource location is unavoidable during construction or maintenance of the FSRU and pipeline, further investigations in the form of complete documentation and possible excavation and/or data recovery would be	Oak trees are typically protected by local ordinance, and SoCalGas will avoid impacts to oak trees along the proposed alignment. The remainder of the mitigation should be deleted. There is no regulatory requirement to protect species of local Native American concern.

G484-105

Comment noted, but no change was made.

G484-106

Section 4.8.4 has been revised. Appendix I contains information on consultation with the USFWS.

G484-107

Table 4.9-4 in Section 4.9.2 contains information on this topic.

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The Applicant proposed the measure in question. Applicant measures are considered part of the Project.



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4.9-22	1-4	Impact Cultural-3	would be implemented. All such investigations would include Native American participation where mandated by local, State, and Federal law. Indirect impacts could also occur and are defined as those associated with increased accessibility of cultural resource sites to artifact collectors or vandals and introduction of visual elements that may compromise the integrity of an important setting or historic or traditional values.	Implemented. All such investigations would include Native American participation where mandated by local, State, and Federal law. Indirect impacts could also occur and are defined as those associated with increased accessibility of cultural resource sites to artifact collectors or vandals and introduction of visual elements that may compromise the integrity of an important setting or historic or traditional values.	The proposed project will not increase access to known cultural sites, and SoCalGas is not responsible for any potential vandalism. The proposed project is in unrestricted areas with open access to the public, including roadways and existing cultivated areas. It is not reasonable to place the responsibility for impacts caused by artifact collectors and vandals on SoCalGas. For the most part the project is within existing streets or ROW, therefore the proposed action will not increase accessibility or introduce "visual elements that may compromise the integrity of an important setting or historic or traditional values."
4.10-4	25	Mineral Resources - Line 225 Pipeline Loop	"Mapping of aggregate resources is not currently available."	Add a statement to the effect that the California State Mining and Geology Board has not mapped and/or classified the aggregate resources in the area where the Line 225 Pipeline Loop would be constructed, as appropriate.	Where stated, "not currently available," it is unclear whether the author was unable to obtain the data, or whether the MRZ classifications described in the preceding paragraph do not exist for this area. Please clarify this statement.
4.10-5	Table 4.10-1	Major Laws, Regulatory Requirements, and Plans for Energy and Minerals		Include brief discussion of: Coastal Zone Management Act (CZMA), 1972 Outer Continental Shelf Lands Act (OCSLA), 1953 Federal Oil & Gas Royalty Management Act, 1982 - (created the MMS)	There is no discussion of federal energy & mineral laws that could apply to offshore/coastal portions of the project. Should mention these even if they are not driving the Project's permits.
4.11-22	14	Ground Shaking	Ground shaking is the earthquake effect that results in the vast majority of damage.	Ground shaking is the earthquake effect that results in the vast majority of damage to man-made and above-ground structures. Ground shaking, however, is not a significant hazard to modern buried gas	Original statement is too vague and is incorrect with respect to gas pipelines.

G484-108  
(cont'd)

G484-109

G484-110

G484-111

G484-112

G484-109

Section 4.9.4 has been revised.

G484-110

Section 4.10.1.1 has been revised. For clarification, the California State Mining and Geology Board has not mapped and classified the aggregate resources in this area.

G484-111

As suggested, the three laws have been added to Table 4.10-1, Major Laws, Regulatory Requirements, and Plans for Energy and Minerals.

G484-112

The text has been revised.



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G484-112 (cont'd)				pipelines.	
G484-113	34-37	Mass Movement	Multiple errors		Pipeline routes are selected to avoid geologic hazards when feasible, in particular, landslide areas.
G484-114	1-18	Liquefaction	Multiple errors		Liquefaction is not a hazard to modern pipelines unless accompanied by lateral spread. Not all areas of liquefaction potential are at risk of lateral spread. Consequently, a geotechnical investigation would be necessary to determine locations along the pipelines where lateral spread may pose a risk.
G484-115	All	Regulatory Setting		Clarify which regulations apply to onshore vs. offshore pipelines. The MMS does not regulate the onshore natural gas transmission pipelines. The Uniform Building Code and California Building Code do not apply to below-ground gas transmission pipelines operated by public utilities.	
G484-116	Table	California State Lands Commission	*Requires that the pipeline meets current seismic standards...	Requires that the pipeline meets current seismic standards guidelines...	CPUC and DOT regulations require that a geologic hazard analysis be conducted and appropriate design measures incorporated into the pipeline design and construction. The latest research and industry reference materials are used to guide the aid in the design of the pipeline.
G484-117	MM GEO-3c 4-11-30 6-69	Geotechnical Studies	*...suspected active fault crossings.*	...suspected active fault crossings	The 1984 ASCE Guidelines are not "standards" or regulatory requirements. A new set of guidelines will be published in 2005. Not sure what is meant by "suspected."
G484-118	MM GEO-3d 4-11-30 6-69	Design and Operational Procedure	*...and seismic switches/alarms.*	...and seismic switches/alarms telemetric control.	

G484-113

Comment noted.

G484-114

The text has been revised as follows: "However, liquefaction is not a hazard to modern pipelines unless accompanied by lateral spread. Not all areas of liquefaction potential are at risk of lateral spread."

G484-115

Section 4.9.4 has been revised.

G484-116

The text has been modified to change the term "standards" to "guidelines."

G484-117

The proposed pipeline may cross faults in several locations where the exact location of the faults is not known, particularly if there is no surface expression of the fault in areas of recent alluvium or offshore. Thus, the pipeline crosses a suspected fault, i.e., where the fault line is projected.

G484-118

Section 4.4.11 has been revised.



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4.11-33	9-10	O'Rourke and Palmer report			There are errors in the dates stated.
4.11-33	14-18	California State Lands Commission	*...requires the incorporation of current seismological standards... and ...recognized industry standards...*	...requires the incorporation of current seismological standards guidelines... and ...recognized industry standards guidelines ...	The 1984 ASCE guidelines provided are not "standards" or regulatory requirements. The forthcoming 2005 guidelines should be referenced instead.
4.11-34	10-12	MM GEO-3d, Design and Operational Procedures	*...shall be followed.*	...shall may be followed.	The 1984 ASCE guidelines provided are not "standards" or regulatory requirements. The forthcoming 2005 guidelines should be referenced instead. Also, the guidelines identified are not required and therefore, do not have to be followed. The word "shall" must be removed.
4.11-34	15-16	MM GEO-3d, Design and Operational Procedures	*...and seismic switches/alarms.*	...and seismic switches/alarms telemetric control.	
4.11-34	27-30	Impact GEO-4, Damage to Pipelines and Associated Facilities from Surface Shaking	*Pipe damage also may result from transient ground deformation...*		This is highly unlikely and has been documented by industry experts. Reference to the O'Rourke and Palmer study findings is not much of a concession. Wording changes are required.
4.11-34	1-2	MM GEO-4a	*...shall include...*	*...shall may include...*	The guidelines identified do not have to be included. The word "shall" must be removed.
4.11-35	1-2	MM GEO-4a	*...Guidelines for the Seismic Design of Oil and Gas Pipeline Systems*		The 1984 ASCE guidelines provided are not "standards" or regulatory requirements. The forthcoming 2005 guidelines should be referenced instead.
4.11-30 6-68	GEO-1d	Trenching and Construction	*...erosion control measures, such as straw bales, shall be implemented to prevent water from entering the trench.*	Delete or refer to MM Wat-7a. Instead. Redundant with WAT-7a, Erosion Control Plan. Also would be covered by SWPPP.	This measure is applicable to water quality, not geology and is redundant with measure WAT-7a, Erosion Control Plan, which specifies in part: "The following measures, or comparable measures based on site-specific features, shall be addressed to minimize the incidence of sediment mobilization during

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G484-119

Section 4.11.4 has been revised.

G484-120

Section 4.9.4 has been revised.

G484-121

Section 4.11.4 has been revised. "Shall" is used because the mitigation is required, not optional.

G484-122

The text has been revised.

G484-123

The use of "may" in the text incorporates the concept of unlikely.

G484-124

See the response to Comment G484-121.

G484-125

The 2005 ASCE guidelines were not available at the time of publication.

G484-126

The erosion control measure that applies to Impact GEO-1, as well as to terrestrial biological and water quality impacts, is identified as AM TerrBio-1a in the March 2006 Revised Draft EIR and in the Final EIS/EIR.



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G484-126 (cont'd)	4,12-16 6-74	AMM HAZ-3e, Cleanup of Soil and Groundwater	AMM HAZ-3e, Cleanup of Soil and Groundwater Soil contamination in OU2 immediately adjacent to or within the proposed pipeline route is expected to be cleaned up by 2006 and certified as such by DTSC. The Applicant shall coordinate with DTSC to ensure that OU2 has been certified as clean, to identify status of site-wide groundwater remediation for OU7, and to determine whether additional surveys or screening level sampling should be conducted for areas to be disturbed by pipeline construction prior to any	AMM HAZ-3e, Consult with DTSC on Status of Cleanup of Soil and Groundwater at Whittaker-Burmita Site (M.P. 0.35-1.35) Soil contamination in OU2 immediately adjacent to or within the proposed pipeline route is expected to be cleaned up by 2006 and certified as such by DTSC. The Applicant shall coordinate with DTSC on behalf of the Applicant to ensure that OU2 has been certified as clean-to identify status of site-wide groundwater remediation for OU7 potential soil and/or groundwater contamination hazards present in the proposed pipeline alignment, and to	construction. Straw bales are a highly permeable barrier and are generally ineffective at preventing water from entering trenches. In most pipeline construction scenarios, it is impossible to prevent surface flow of water from entering the trench or any excavation. Appropriate BMPs, however, can redirect surface flow or lessen the velocity of flow to reduce erosion and transport of sediment by surface waters that may enter the trench. These BMPs include straw bales, silt fence, and straw wattles as described in Sempira's Water Management Practices Manual. Furthermore, in areas of high ground water elevations, water may naturally enter the trench through percolation and infiltration from the surrounding soil. Accumulated trench water will be removed from the trench in accordance with the appropriate trench dewatering permit issued by the Los Angeles Region 4 Water Quality Control Board 1. SoCalGas is not the Applicant. 2. Ground water is not anticipated to be encountered during pipeline construction in this high-elevation area due to the topography and the shallow depth of excavation for the pipeline installation (approx. 8 feet). Consequently, ground water should not be a concern for the pipeline project in the vicinity of the Whittaker- Burmita site. 3. The proposed Line 225 Pipeline Loop alignment lies parallel and

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Section 4.12.4 has been updated; however, consultation with the DTSC would still be required. See the responses to Comments G484-2 and G484-108.



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			construction. To confirm that the appropriate level of coordination occurs with DTSC, the applicant shall submit a letter detailing the status of the site and any specific measures that are to be conducted to USCG and CSLC, with a copy to DTSC, 60-days prior to initiating construction.	determine whether additional surveys or screening level sampling should be conducted are warranted for in areas to be disturbed by pipeline construction prior to any construction. To confirm that the appropriate level of coordination occurs with DTSC, the applicant shall submit a letter detailing the status of the site results of consultation with DTSC and any specific measures that are to be conducted implemented during construction to USCG and CSLC, with a copy to DTSC, 60-days prior to initiating construction. CSLC shall assist SoCalGas with DTSC consultation, if requested by SoCalGas.	Immediately adjacent to the existing Line 225, which was constructed in the late 1950/early 1960s and has been patrolled and maintained on a regular basis for the past five decades. Due to the previous disturbances along the proposed construction ROW associated with the original Line 225 construction, SoCalGas believes that soil contamination and UXO will not be present in the proposed alignment. 4. There is no practical purpose for SoCalGas to consult with DTSC on the status of the entire Whitaker-Burnilla site and report back to USCG and CSLC. SoCalGas, and the Applicant, are only concerned with possible hazards associated with the proposed construction ROW and will consult with DTSC accordingly on the limited geographic area of interest specific to the proposed pipeline alignment. 5. Site remediation/clean-up and DTSC certification does not need to be completed prior to commencing construction. Appropriate health and safety measures will be implemented as needed to ensure the safety of workers during pipeline construction, regardless of the status of site remediation. 6. SoCalGas is not responsible for delineating pre-existing contamination on the site, nor for remediating the site. DTSC should provide SoCalGas with existing data and maps that

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G484-127 (cont'd)	6-77	AMM HAZ-7a	AMM HAZ-7a Implementation of the mitigation measures for HAZMAT-5a through 5f would reduce the potential of a spill and would reduce the potential impact of any spill that occurred.	AMM HAZ-7a (no title) Implementation of the mitigation measures for HAZMAT-5a through 5f would reduce the potential of a spill and would reduce the potential impact of any spill that occurred. DELETE AS REDUNDANT SIMPLY REFER BACK TO MEASURES HAZ-5a through HAZ-5e, rather than create a new measure.	document current conditions (contaminant concentrations and horizontal/vertical distribution of contaminants in soil) specific to the area where the proposed project crosses the Whitaker-Burnille site. 7. CSLC should assist SoCalGas with obtaining necessary data from DTSC. If DTSC is not responsive to SoCalGas request. 8. A DTSC point of contact for the Burnille site project should be specified in the DEIR/EIS and should be provided to SoCalGas. 9. Name of mitigation measures HAZ-3a is misleading. This measure pertains to the status of the facility's clean-up effort and the status of contamination within the proposed ROW between M.P. 0.35-1.35. Please clarify. REDUNDANT with Measures HAZMAT-5a through 5f (if does not exist) - so why relabel this measure as a separate measure called HAZMAT-7a? Please strike as unnecessary.
G484-128	4.14	Intro	Noise - sensitive receptors		Should provide a brief description of what/who "sensitive receptors" are, since this term is used to describe impacts.
G484-129	4.14-12/ 4.14-13	15/ Table 4.14-6	Noise - Impact NOI-5 Worst-case construction noise levels	Please provide a footnote to Table 4.14-5 that describes the formula or method used to derive the worst-case results recorded in the last line of the table. (if it is a computer model, name the model and source.)	I see that the 99 dBA number comes from Table 4.14-6, but it is unclear to me how those worst-case noise levels are calculated.
G484-130	4.14-12	25-26	Noise - Impact NOI-5 Construction noise	However, implementation of mitigation measures would reduce the noise levels to less than significant levels.	
G484-131					

G484-128

Section 4.12.4 has been revised.

G484-129

Section 4.14 has been revised.

G484-130

The formula for combining noise levels to arrive at worst case levels has been added to the table as a footnote.

G484-131

Section 4.12.4 has been revised; however, construction noise would still represent a significant impact.



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4.14-14	27	Noise - Impact NOI-6	"An estimated 400 to 450 truck trips..."		Clarify whether this figure refers to round trips or one-way trips.
4.14-14	28-33	Noise - Impact NOI-6	"The peak noise levels associated with passing trucks (up to 88 dBA at 50 feet 15.2 m)... However, the peak noise levels would not exceed the significance criteria."		Is this because the standards are based upon 1-hour averages and the peak noise levels are of such short duration (e.g., 10 seconds or so as they pass the receptor) that the average levels remain low enough? Please clarify why the noise standards (65-65 dBA daytime for residences), and thus the significance criteria, are not exceeded.
4.14-17	9-11	Noise - Center Road Pipeline Alternative 2	"During worst-case activity, residences would experience... a noise level greater than the City of Oxnard allowable sound level of 65 dBA in daytime for a commercial area."	"During worst-case activity, residences would experience... a noise level greater than the City of Oxnard allowable sound level of 65 dBA in daytime for a commercial residential area."	Since this statement applies to "residences" the applicable standard for comparison is the residential standard, not the commercial standard.
4.15-1	34-35	Recreation - MM REC-6b	"The Applicant shall restore the multi-use trail along the south fork of the Santa Clara River to its original condition before construction."	"The Applicant shall restore the multi-use trail along the south fork of the Santa Clara River to its original pre-construction condition before construction."	Reword for clarity.
4.16-13	Table 4.16-9	Major Laws, Regulatory Requirements, and Plans for Socioeconomics		Include brief discussion of: Coastal Zone Management Act (CZMA), 1972 Outer Continental Shelf Lands Act (OCSLA), 1953 Federal Oil & Gas Royalty Management Act, 1982	Add federal statutes to table.
4.16-16	5-13	Socioeconomics - Impact Socio-1 Water use	"This represents [X.XXX] percent of the annual total water use."	This represents [X.XXX] percent of the annual total water use from the municipal system, or as appropriate (2 places in this paragraph).	Please clarify if this statement refers to the annual total water use through the municipal system or the project's annual total water use.
4.16-18	16-30	Socioeconomics - Impact Socio-4 Temp disruption of local business		Make note of the temporary loss of productive farm land during construction and point the reader to discussion of agricultural impacts and mitigation in Section 4.5.	Farms are businesses that contribute to the economy, so it makes sense to mention the temporary loss of agricultural land during pipeline construction in this section.
4.16-19	3	Socioeconomics - multiplier effects	"This impact does not include additional economic impacts from multiplier effects."	Briefly define what a multiplier/multiplier effect is.	Not clear from the text what a "multiplier effect" is. Many readers won't know what this is.

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G484-132

Section 4.14.4 has been revised. See Impact NOI-7.

G484-133

Section 4.14.4 has been revised. See Impact NOI-7.

G484-134

Section 4.14.4 has been revised.

G484-135

Section 4.15.4 has been revised. See MM REC-6b.

G484-136

The Federal acts cited do not primarily govern socioeconomic impacts and are therefore not discussed in Section 4.16. The key elements of Coastal Zone Management Act are presented in Table 4.10-1. The Outer Continental Shelf Lands Act is listed under statutes and regulatory references in Section 4.2.10 and is administered by the National Oceanic and Atmospheric Administration (NOAA), a cooperating agency for the proposed Project. The Federal Oil & Gas Royalty Management Act of 1982 mandates protection of the environment and conservation of Federal lands in the course of building oil and gas facilities. Its supervision of offshore operations after lease issuance is administered by the Minerals Management Service (MMS), which is also a cooperating agency for the proposed Project. The MMS also is responsible for the mineral leasing of submerged outer continental shelf under the Outer Continental Shelf Lands Act. MMS, NOAA, and other agency authorities for the Project are identified in Table 4.2-3.

G484-137

This topic is discussed in Section 4.16.1.

G484-138

The issue of temporary disruption of agricultural production is discussed in Section 4.5.4.

G484-139

Section 4.16.4 has been revised.

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Page	Line No.	Subject	Statement	Correction	Comment
4.16-26	25-27	Socioeconomics - No Action Alternative	"This alternative would eliminate the impacts associated with the construction and operation of the pipelines."	This alternative would eliminate the impacts associated with the construction and operation of the pipelines and other Project facilities.	Clarify statement.
4.17-22	23-25	Transportation - No Action Alternative	"This alternative would eliminate the impacts associated with the construction and operation of the pipelines. However, it would not be possible to distribute the natural gas throughout Southern California."	This alternative would eliminate the impacts associated with the construction and operation of the pipelines and other Project facilities. However, it would not be possible to distribute the natural gas from the Project throughout Southern California.	Clarify statements.
4.18-12	2 <sup>nd</sup> Cell	US CWA Section 402	Third Bullet Item - "Discharges to Federal waters would require..."	Discharges to Federal waters that are not also waters of the State would require...	The potential for encountering groundwater while excavating is not addressed in this document.
4.18-12	2 <sup>nd</sup> Cell	US CWA Section 402		Add a bullet: "The discharge of groundwater potentially encountered during excavation/drilling would require an NPDES permit."	On a case-by-case basis, the ACOE often treats HDD stream crossings as a non-jurisdictional activity as there are often no associated dredge or fill impacts.
4.18-12	3 <sup>rd</sup> Cell	US CWA Section 404			This section should address 404 requirements for dredge and fill activities, as those are the activities and associated impacts the ACOE regulates.
4.18-13	1 <sup>st</sup> Cell	California Porter-Cologne Act	2 <sup>nd</sup> Bullet Item - "...from construction sites involving more than five acres."	"...from construction sites involving more than five one acres."	Bullets 2 and 3 do NOT belong under the Porter-Cologne section. Because this refers to an NPDES permit, bullets 2 and 3 should be under the CWA Section 402 discussion.
4.18-13	1 <sup>st</sup> Cell	California Porter-Cologne Act	3 <sup>rd</sup> Bullet Item - "A SWPPP will be prepared and implemented to address the specific water quality concerns for the construction phases of the Project upon request of the LARWQCB."	"A SWPPP will be prepared and implemented to address the specific water quality concerns for the construction phase of the Project upon request of the LARWQCB as required by the NPDES permit."	Move to Section 402 discussion.
4.18-13	1 <sup>st</sup> Cell	California Porter-Cologne Act	"...onshore construction-related activities that required discharges such as"	"...onshore construction-related activities that required discharges such as"	Move to Section 402 discussion.
4.18-14	6-7				The potential for encountering groundwater while excavating is not

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G484-140

Section 4.16.4 has been revised.

G484-141

The description of the "No Action Alternative" has been revised.

G484-142

Section 4.18.4 has been revised.

G484-143

Section 4.16.4 has been revised.

G484-144

Section 4.8 contains information on this topic.

G484-145

Section 4.18.2 has been revised.

G484-146

Section 4.18.2 has been revised.

G484-147

Section 4.18.2 has been revised.

G484-148

Section 2.7.1.2 contains information on this topic.



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4.18-14	8-18		stormwater and hydrostatic water.	stormwater, and hydrostatic water, and groundwater. Dowatering.	The procedures outlined for the NPDES permits required for this project are NOT correct. Since they are all general permits, an NOI is submitted and approved if they meet the general permit conditions of applicability. A biologist is not required for NPDES issues.
4.18-21	20	MM WAT-3e (referenced later in doc for onshore issues)	...qualified biological monitor to ensure that it meets local, State, or...	* qualified biological environmental monitor, or suitably trained water quality specialist, to ensure that it meets local, State, or...	
4.18-21	21	MM WAT-3f (referenced later in doc for onshore issues)	MM WAT-3f (referenced later in doc for onshore issues)	Add to text: "Sampling and testing of constituents will be conducted according to the requirements of the NPDES permit."	A biologist is not required for NPDES issues.
4.18-21	22	MM WAT-3f (referenced later in doc for onshore issues)	"A qualified biological monitor..."	"A qualified biological environmental monitor, or suitably trained water quality specialist."	
4.18-23	16-17	Onshore - Construction/Installation	"releases of drilling muds in upland areas is presented in Section 4.12. "Hazardous Material."	"releases of drilling muds in upland areas is presented in Section 4.12. "Hazardous Material."	Drilling mud is not a hazardous material. It consists of an aqueous-based bentonite (clay) slurry. In many cases, its disposal to land is exemplified by the RWQCBs. Delete from Section 4.12. "Hazardous Materials" as well.
4.12-17	8-14	Activities associated with onshore construction and drilling could result in a temporary accidental spill of hazardous materials or oil.	Operation of the HDD equipment could result in the accidental release of hazardous materials. Chemicals associated with HDD include drilling detergents, oil well drilling additives, fluid loss reducers, grouting material, viscosifiers, wetting agents, gelling agents, shale inhibitors, stabilizers, amonite and nonionic surfactants, lubricants, and HDD fluids. Most of these materials are not considered regulated hazardous wastes. Any of these fluids or materials could be accidentally released during HDD construction and the impact could be significant, depending on the size of the spill.	Operation of the HDD equipment could result in the accidental release of bentonite drilling mud, a non-hazardous drilling fluid. An HDD contingency plan (MM WAT-5a) would be developed to minimize or prevent frac-outs (loss of drilling mud at the ground surface) and contain drilling mud spills within sensitive habitat areas, such as the Santa Clara River streambed. Bentonite drilling mud is not a hazardous substance. Hazardous materials - Chemicals associated with HDD include drilling detergents, oil well drilling additives, fluid loss reducers, grouting material, viscosifiers, wetting agents, gelling agents, shale inhibitors, stabilizers, amonite and	The type of materials described in the original statement are typical of directional drilling in deep, high-pressure, high-temperature environments associated with offshore and onshore oil production wells, and this is not applicable to shallow horizontal directional drilling employed for natural gas transmission pipeline construction.  The HDD process SoCalGas may employ as the alternative crossing method at the Santa Clara River would be roughly 60 feet below the depth of the streambed, primarily

G484-149

Section 4.18.2 contains updated information on this topic.

G484-150

Section 4.18.4 has been revised. See MM WAT-3a.

G484-151

Section 4.18.4 has been revised.

G484-152

Section 4.18.4 has been revised.

G484-153

The cited statement merely indicates where the topic is discussed in the document; therefore, the text was not changed.

G484-154

The Project has been modified since issuance of the October 2004 Draft EIS/EIR. See Sections 2.6.1 and 4.18.4 for the updated analysis on this topic.

G484-148  
(cont'd)

G484-149

G484-150

G484-151

G484-152

G484-153

G484-154



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Page	Line No.	Subject	Statement	Correction	Comment
4.18-25	11-16, 25-28	Impact WAT-6: Short-term degradation in surface water due to release of contaminants from hydrostatic test water.	WAT-3b: Aerate Hydrostatic Test Water WAT-3c: Minimize Use and Regulate Residence Time of Bicide WAT-3d: Environmentally Friendly Oxygen Scavengers	<p>Nonhazardous surfactants, lubricants, and HDD fluids. Most of these materials are not considered regulated hazardous wastes. Any of these fluids or materials could be accidentally released during HDD construction and the impact could be significant, depending on the size of the spill.</p> <p>DELETE MEASURES - Not Applicable to Onshore Pipeline Construction WAT-3b: Aerate Hydrostatic Test Water WAT-3c: Minimize Use and Regulate Residence Time of Bicide WAT-3d: Environmentally Friendly Oxygen Scavengers</p>	<p>horizontally oriented within a relatively simple coarse alluvium associated with the Santa Clara River. No "oil well drilling" additives, fluid loss reducers, grouting material, viscosifiers, wetting agents, gelling agents, shale inhibitors, stabilizers, surfactants or lubricants would be required. The drilling mud for shallow construction-related HDDs in coarse sands consists of an aqueous bentonite (montmorillonite clay) slurry, which is non-hazardous and may be disposed of on upland areas (usually agricultural farmland) as a soil conditioner because of the high clay content. Occasionally other inert material may be added to increase the weight/density of the bentonite slurry to prevent the surrounding sediments from slumping into the borehole while drilling.</p> <p>The only materials associated with a shallow HDD that may pose a contamination issue would be the potential release of hydraulic fluid from the HDD rig or heavy equipment and/or minor diesel spills associated with refueling diesel equipment on-site. Containment of spills would be addressed in an SPCC plan.</p> <p>SoCalGas is not the applicant.</p> <p>SoCalGas will not add bicide or oxygen scavengers to the hydrostatic test water prior to filling or discharging. SoCalGas will not contain the water within the pipeline for greater than 10 days prior to discharging.</p>

G484-154  
(cont'd)

G484-155

G484-155

Section 4.18.4 has been revised; see Impact WAT-4. Sections 2.6.2 and 2.7.2.1 contain additional information on this topic.



A. J. Serrano Energy, Inc.

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4.18-25	29-33	Mitigation Measures for Impact WAT-6	WAT-3a. Evaluate hydrostatic test water before release. WAT-3f. Monitor the Release of Test Water	DELETE - Measures unnecessary as impact is less than significant per DEIR/EIS (Line 33). WAT-3a. Evaluate hydrostatic test water before release. WAT-3f. Monitor the Release of Test Water	Consequently, AMM WAT-3a, WAT-3c, WAT-3d are not applicable to the onshore pipeline construction and should be deleted. If these measures apply to the offshore project only, then they should be written in a manner that is specific to the offshore component of the project to be constructed by the Applicant (BHP Billiton) as part of Impact WAT-3.
4.18-25	1-23	Mitigation Measures for Impact WAT-6			If these mitigation measures (WAT-3a and WAT-3f) are not needed (optional), because the impact is less than significant to begin with, then why propose them? Clearly, the DEIR/EIR on Line 33 states that the measures are "not necessary".
4.18-26	30-31	AMM HAZ-5b. Stormwater Pollution Prevention Plan	AMM HAZ-5b. Stormwater Pollution Prevention Plan applies here	AMM HAZ-5b. Stormwater Pollution Prevention Plan applies here	Add a statement that hydrostatic test water may be treated prior to discharge to remove sediment/turbidity if it is above the permit effluent limitations. AMM HAZ-5b (also on page 6-75) actually states "Use Best Management Practices" but the measure itself does not refer to SWPPP. Haz-5b should be struck from 4.18-26 and WAT-7 should be updated to reflect SWPPP preparation and implementation requirement.
4.12-17 (Haz Mat section with SWPPP Reference)	33-35	Impact HAZMAT-5. Potential hazardous materials spills due to Onshore Construction or Transportation	The SWPPP would be submitted to the Regional Water Quality Control Board, the USCG, and the CSLC 60 days prior to beginning construction.	The SWPPP would be submitted to the Regional Water Quality Control Board, the USCG, and the CSLC 60 days prior to beginning construction.	There is NO regulatory or permit requirement to submit the SWPPP to the RWQCB for review or approval. Statement should be removed. SoCalGas would submit the SWPPP to USCG and CSLC for verification purposes that the SWPPP was completed, if requested.

G484-155  
(cont'd)

G484-156

G484-157

G484-158

G484-159

G484-156

Mitigation Measures for Impact WAT-6 has been updated.

G484-157

The text in Section 4.18.4 has been updated.

G484-158

Section 4.18.2 contains information on this topic. Since the preparation of an SWPPP is a regulatory requirement, it is not mitigation.

G484-159

See the response to Comment G484-158.



U.S. Department of the Interior  
Bureau of Land Management

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4.18-28 6-96	23	MM WAT-7a, Erosion Control Plan	MM WAT-7a Erosion Control Plan The Applicant shall develop an Erosion Control Plan and the plan must be submitted to and approved by the CSLC at least 60 days before construction of the Project begins. Erosion and sediment mobilization during construction:  Bullet #1: Clear vegetation to the minimal area needed to conduct the construction activities;  Bullet #2: Sidecast all excavated material in upland habitat areas within the work area;  Bullet #3 Protect any work near or adjacent to any drainage or wetland through the installation of orange construction fencing, backed by silt fencing;  Bullet #4: Stabilize all disturbed soils by compaction and recontouring the entire area to pre-construction grades upon completion of the pipeline construction work;  Bullet #5: Direct runoff away from disturbed areas using temporary drainageways;  Bullet #6: Monitor turbidity downstream of the drill or trenching sites;  Bullet #7: Stabilize plant site roadways by compaction or use of gravel;  Bullet #8: Utilize soil stabilizers (most commonly water) on disturbed areas as appropriate and as required by South Coast Air Quality Management District (SCAQMD) rules;  Bullet #9: Utilize straw bale barriers to	MM WAT-7a Erosion Control Plan The Applicant shall develop an Erosion Control Plan and the plan must be submitted to and approved by the CSLC at least 60 days before construction of the Project begins. Erosion and sediment mobilization during construction:  Bullet #1: Clear vegetation to the minimal area needed to conduct the construction activities;  Bullet #2: Sidecast all excavated material in upland habitat areas adjacent to the trench within the work area disturbed ROW, or hauled offsite to a designated temporary spoil storage yard;  Bullet #3 Protect any work near or adjacent to any drainage or wetland through the installation of orange construction fencing, backed by silt fencing;  Bullet #4: Stabilize all disturbed soils by compaction and recontouring the entire area to pre-construction grades upon completion of the pipeline construction work;  Bullet #5: Direct runoff away from disturbed areas using temporary drainageways;  Bullet #6: Monitor turbidity downstream of the drill or trenching sites when construction activities are occurring at flowing streams;  Bullet #7: Stabilize plant site roadways by compaction or use of gravel;  Bullet #8: Utilize soil stabilizers (most	Bullet #1: Redundant with many other measures, including confining work and disturbance to the ROW, which is the minimum area required to conduct construction activities.  Bullet #2: Sidecast spoils should not be placed in habitat suitable for listed species. Rework measure as shown for improved clarity.  Bullet #3: DELETE - REDUNDANT with fencing/markings/avoidance required in MM TerBle-3c, TerBle-3b, TerBle-2b, and TerBle-2a.  Bullet #4: This measure is incorrect. The top 6 inches of soil in agricultural fields specifically should be decompacted to a level equivalent with adjacent areas outside of the ROW to promote soil productivity. Backfill within roadways should be compacted to 95%. Backfill in natural and unpaved areas should be compacted to no more than 85% to promote vegetation regrowth.  Bullet #7: There are no plant site roadways associated with this project.  Bullet #9: Too vague to implement, redundant with the intent of all other Erosion Control plan measures.  Bullet #10: Provide specifications for check dam.  Bullet #11: Stormwater retention basins are not necessary or effective for a linear project such as this.

G484-160

G484-160

Section 4.8.4 contains revised information on this topic. The measures have been identified by the Applicant as part of the Project.





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G484-160 (cont'd)			Intercept sediment-laden runoff from small areas of disturbed soil;	commonly water) on disturbed areas as appropriate and as required by South Coast Air Quality Management District (SCAQMD) rules;	Bullet #12: What is the Final Plan? Bullet #15: This requirement would be addressed in the fugitive dust plan.
			Bullet #10: Create straw check dams to reduce erosion of existing drainage channels and promote sedimentation behind the berm.  Bullet #11: Create stormwater retention basins to retain runoff and allow excessive sediment to settle out; Bullet #12: Inspect temporary erosion control devices during construction in accordance with the Final Plan schedule;  Bullet #13: Replace damaged or missing structures immediately.  Bullet #14: Notify Project construction crews regarding when to implement adequate precautions in anticipation of poor weather conditions;  Bullet #15: Dictate appropriate wetness when watering a road for dust suppression.  Bullet #16: Develop remedial erosion controls for problem areas, if any;  Bullet #17: Protect stockpiled soil from runoff with hay bales or silt fencing; suppress dust with water.  Bullet #18: Install temporary slope breakers at spacing recommended by the Natural Resources Conservation Service (NRCS);  Bullet #19: Construct slope breakers from soil, silt fences or staked hay or straw bales;  Bullet #20: Inspect, replace and repair straw bale barriers and or check dams as needed	Bullet #9: Utilize straw-bale barriers to intercept sediment-laden runoff from small areas of disturbed soil;  Bullet #10: Create straw check dams or a sediment curtain, where needed, to reduce erosion of in-existing flowing drainage channels and promote sedimentation and minimize turbidity downstream from stream crossings behind the berm;  Bullet #11: Create stormwater retention basins to retain runoff and allow excessive sediment to settle out; Bullet #12: Inspect temporary erosion control devices during construction in accordance with the Final Plan schedule;  Bullet #13: Replace damaged or missing structures immediately;  Bullet #14: Notify Inform Project construction crews regarding when to implement adequate precautions in anticipation of poor weather conditions;  Bullet #15: Dictate appropriate wetness when watering a road for dust suppression;  Bullet #16: Develop Implement corrective action for remedial construction-induced erosion controls for problem areas, if any;  Bullet #17: Protect stockpiled soil piles greater than 8 feet tall from runoff with hay bales or silt fencing at the base of the pile (Stockpile Management BMPs); suppress	Bullet #17: A stockpile height should be specified; installing silt fence for stockpiled soil along the construction ROW is unnecessary as the pile is very low and is adjacent to the trench. For soil stockpiled in soil staging areas or the contractor yard, where piles may be quite high (greater than 8 feet), stockpile management BMPs are warranted and feasible. Dust suppression is dealt with in the Fugitive Dust Plan.  Bullet #20: Half of the height of the barrier is industry standard practice for BMP maintenance, rather than 6-inches.  Bullet #21: What does a "linear facility" include? Define significant, or make it consistent with other measures (e.g. 0.5 inch rainfall event). The surface of the earth is subject to erosion, so it is impossible to find an area that is not.  Bullet #22: Is not clearly worded.  Bullet #23 does not make sense. Stockpile management BMPs should be inspected and maintained daily.  Bullet #24: The season and active equipment are not dependent factors. The measure, as written, does not make sense and should simply be specific to rainfall events, regardless



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			and remove accumulated sediment when it reaches a depth of 6 inches;  Bullet #21: Inspect sandbags placed along the toes of slopes and at linear facility structures, removing sediment after each significant storm event and depositing the sediment in a stable area not subject to erosion;  Bullet #22: Remove or re-grade sediment that accumulates more than 1 foot behind the (sandbag) barrier;  Bullet #23: Inspect protected storage areas for stockpiled soils or other materials;  Bullet #24: Depending on the season, inspect slope breakers in areas of active equipment or within 24 hours of each 0.5 inch of rainfall; and  Bullet #25: Maintain slope breakers until revegetation measures are successful or the area is stabilized.  Bullet #26: A qualified biological monitor shall ensure these requirements are continually being met and will have the authority to shut down construction if they are not.	duct-with-water;  Bullet #18: Install temporary slope breakers at spacing recommended by the Natural Resources Conservation Service (NRCS);  Bullet #19: Construct slope breakers from soil, silt fences or staked hay or certified weed-free straw bales;  Bullet #20: Inspect, replace and/or repair stow bale-barriers-structures and or check dams as needed-and-remove. Maintain barriers structures when accumulated sediment when-it-reaches a-depth-of-6 inches half of the height of the structure;  Bullet #21: Inspect sandbags placed along the toes of slopes and-at linear-facility structures, removing accumulated sediment within 24 hours of each-significant-storm 0.5 inch rainfall event and depositing the sediment in a stable area-not subject-to-erosion;  Bullet #22: Remove accumulated soil greater than 1 foot deep from sandbag barriers and redistribute in stable upland area. Remove-or-re-grade-sediment-that accumulates-more-than-1-foot-behind-the (sandbag)-barrier;  Bullet #23: Inspect-protected-storage-areas for-stockpiled-soils-or-other-materials. Stockpile management BMP's should be inspected and maintained daily;  Bullet #24: Depending-on-the-season, inspect slope breakers-in-areas-of-active equipment-or-within 24 hours of each 0.5 inch of-rainfall event, and  Bullet #25: Maintain slope breakers until	of the season. A separate measure could be added that specifies temporary slope breakers must be replaced at the end of each workday in areas with active equipment.  Bullet #26: A biologist is not required to inspect or monitor erosion issues.

G484-160  
(cont'd)



California  
Department of  
Water Resources

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				revegetation success criteria are met (where required) measures are successful or the area of disturbance is stabilized.  Bullet #26: A qualified biological environmental monitor shall ensure these requirements are continually being met and will have the authority to shut-down temporarily halt construction if they are not maintained as required by the Erosion Control Plan.	
4.18-28 6-100	35-36	MM WAT-7c, Transport Sediment Spills	MM WAT-7c Transport Sediment Spills Off-Site Sediment excess trenches that are not utilized to fill trenches in stream channels shall be transported off site.	MM WAT-7c Transport Sediment Excess Trench Spills Off-Site Sediment excess trenches that are not utilized to backfill trenches in stream channels shall be transported and disposed off site at an appropriate facility.	Excess spoils are common during road construction, and less common at stream crossings and construction in natural areas.
4.18-28 6-100	37-39	MM WAT-7d, Re-establish Contours and Vegetative Cover/Pavement	MM WAT-7d, Re-establish Contours and Vegetative Cover/Pavement Contours and vegetative cover/pavement shall be re-established as soon as practicable following disturbance.	DELETE MEASURE - REDUNDANT WITH TRANS-7a, TerBio-2b, TerBio-3c, Wat-7a MM WAT-7d, Re-establish Contours and Vegetative Cover/Pavement Contours and vegetative cover/pavement shall be re-established as soon as practicable following disturbance.	Create a single Revegetation and Restoration Plan mitigation measure that specifies the components of the plan and delete associated bulleted items in all of the redundant mitigation measures. It is impossible to specify bulleted items for compliance within each measure, and it is impossible to comply with conflicting requirements.  Re-paving of roads would be done in accordance with applicable road encroachment permit requirements. This measure conflicts with the 21-day time limit in Trans-7a.
4.18-33	12-29	Impact WAT-10, Temporary Degradation of Surface Water Quality During Maintenance Activities	Regular maintenance of the pipelines could release petroleum or other contaminants or cause sedimentation of creeks from the use of maintenance vehicles or equipment. Maintenance monitoring of the pipeline, except at block valves and meter stations, would normally be conducted by pigs.	Regular maintenance of the pipelines could release petroleum or other contaminants or cause sedimentation of creeks from the use of maintenance vehicles or equipment. Maintenance monitoring of the pipeline, except at block valves and meter stations, would normally be conducted by pigs.	This entire paragraph is incorrect and should be rewritten with the following information in mind:  1) CPUC and DOT regulations require periodic manual inspections and leak surveys of natural gas

G484-160  
(con'td)

G484-161

G484-162

G484-163

G484-161

The mitigation measure (MM WAT-4b in the Final EIS/EIR) has been revised in response to the comment. See Section 4.18.4.

G484-162

Section 4.18.4 has been revised.

G484-163

Section 4.18.4 has been revised.



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G484-163 (cont'd)			(inside the pipeline) and therefore would not have any impacts on water quality. Excavation and replacement of the pipe section would occur only if corrosion or wall thinning, which could result in the defined impact, were discovered. If so, small spills of petroleum products or other contaminants could enter surface water.	(inside the pipeline) and therefore would not have any impacts on water quality. Excavation and replacement of the pipe section would occur only if corrosion or wall thinning, which could result in the defined impact, were discovered. If so, small spills of petroleum products or other contaminants could enter surface water.	pipelines at much greater frequencies (annually) than are required for internal inspection ("pigging", 7-10 year frequency). Consequently, manual activities such as leak surveys, direct assessment, and isolated repairs due to pipeline exposure are more frequent along a given pipeline than internal inspection/pigging. Simply stated, maintenance monitoring is not "normally" done by pigs.  2) Where maintenance activities, including pigging, have the potential to impact regulated resources (air, surface water bodies, riparian or listed species habitat, listed species, etc.) SoCalGas acquires individual project permits prior to commencing work. Consequently, mitigation measures are implemented for all maintenance activities that have the potential to impact natural resources in consultation with the appropriate agency and/or in compliance with acquired permits.  3) SoCalGas does not transport petroleum in its pipelines. Accidental releases of the following materials could occur during pipeline maintenance: - release of diesel fuel from maintenance vehicles (unlikely given implementation of Semptra BMPs, refueling activity buffer, equipment spill kits, and secondary containment/spill prevention measures installed on refueling trucks) - leakage of hydraulic fuel from heavy equipment (again, unlikely given spill



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ATTACHMENT 1

COMMENTS TO THE CABRILLO PORT LIQUEFIED NATURAL GAS DEEPWATER PORT PROJECT DRAFT EIS/EIR  
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STATE CLEARINGHOUSE # 2004-021107

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					KR BMP) - trench dewatering activities during maintenance (unlikely to cause accidental release of fuel as pumps would have secondary containment) 4) Excavation and/or replacement could occur for many regular operations and maintenance purposes, not simply corrosion or thinning of pipe wall as stated in the DEIS/EIR. SoCalGas maintains a pipeline cathodic protection system that minimizes corrosion of the pipelines and loss of wall thickness.
4.18-33	32-33	AMM WAT-10b	"This Plan shall be submitted and approved by the Los Angeles RWQCB at least 60 days before the construction of the onshore pipelines."	"This Plan shall be submitted and approved by the Los Angeles RWQCB at least 60 days before construction of the onshore pipelines. Incorporated into the SWPPP as a requirement of the construction storm water NPDES permit and the SPCC Plan."	There is no regulatory requirement for a separate Spill Response Plan and no regulatory requirement to submit the SWPPP or SPCC to the Board.
4.19-13	Table 4.19-10	Impact E.J-1, Disproportionate Impact to Minority Community of a Pipeline Accident	Impact E.J-1, Disproportionate Impact to Minority Community of a Pipeline Accident There would be a permanent risk of a pipeline rupture that could cause a fire that would disproportionately adversely affect a minority community (Class II)	DELETE IMPACT. There would be a permanent risk of a pipeline rupture that could cause a fire that would disproportionately adversely affect a minority community (Class II)	As a public utility, SoCalGas operates and maintains its extensive pipeline system in accordance with CPUC and DOT regulations regardless of demographic and socioeconomic characteristics of the surrounding areas.  In addition, the entire pipeline project will be constructed to meet Class 3 Design Criteria. Consequently, the probability of a pipeline failure is no greater in minority communities than at other locations along the proposed alignment. Therefore, there is no disproportionate adverse effect on a minority community.  CPUC General Order 112e and 49 CFR Part 192 do not require pipeline

G484-163  
(con'td)

G484-164

G484-165

G484-164

See the response to Comment G484-158.

G484-165

Pipeline classes are discussed in Section 4.2.8.2. As the Applicant's designated representative, SoCalGas has opted to construct all pipelines to meet Class 3 design criteria. However, implementation of the referenced mitigation measures is feasible and needed to further reduce potential impacts.



# ATTACHMENT 1

## COMMENTS TO THE CABRILLO PORT LIQUEFIED NATURAL GAS DEEPWATER PORT PROJECT DRAFT EIS/EIR

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4.19-13 6-103	Table 4.19-10	MM EJ-1a, Notification in Spanish AMM PS-6a, Meet Class 3 Design Criteria MM PS-6c, Include Automatic Shut Down Valves (ASDVs) and Check Valves in HCAs	MM EJ-1a, Notification in Spanish AMM PS-6a, Applicant Would Construct all Pipelines to Meet Class 3 Design Criteria. MM PS-6c, Include Automatic Shut Down Valves (ASDVs) and Check Valves in HCAs	DELETE MITIGATION MEASURES MM EJ-1a, Notification in Spanish AMM PS-6a, Applicant Would Construct all Pipelines to Meet Class 3 Design Criteria. MM PS-6c, Include Automatic Shut Down Valves (ASDVs) and Check Valves in HCAs	operators to consider the quality of construction of individual private residences that may be located along the pipeline ROW when designing a pipeline. SoCalGas is not the Applicant. MMEJ-1a If there is no disproportionate impact to minority communities then the supporting mitigation measures are not justified. SoCalGas customer service call-centers provide multi-lingual technicians. SoCalGas also maintains Spanish and Chinese versions of its website ( <a href="http://www.socalgas.com/sp/safety/">http://www.socalgas.com/sp/safety/</a> ) and ( <a href="http://www.socalgas.com/ch/safety/">http://www.socalgas.com/ch/safety/</a> ) that address public awareness and safety issues recommended in RP 1162. AMM PS-6a. Comments on this mitigation measure were previously made beginning on Page 9 of this document. MM PS-6c Please refer to the comments on this mitigation measure in the Public Safety Section, starting at Page 9 of this document. Please refer to the mitigation measure comments in the Public Safety Section, starting at Page 9 of this document.
4.19-14	Table 4.19-10	MM PS-7a MM PS-7b MM PS-7c	Define HCA for any potential impact radius (PIR) that includes one or more mobile homes. Assist residents to improve emergency planning. Define an HCA for areas where the PIR includes part or all of a manufactured-home residential community. Implement Public Education/Awareness Program		

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(cont'd)

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See the response to Comment G484-165.

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See the response to Comment G484-165.



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4.19-14	2-5	Impact E.J-1, Disproportionate Impact on Minority and Low- Income Community of a Pipeline Accident	Disproportionate Impact on Minority and Low-Income Community of a Pipeline Accident. There would be a long-term risk of a pipeline rupture that could cause a fire that would disproportionately adversely affect a minority community (Class II).		Please refer to previous comments on Impact E.J-1
4.19-17 6-103	11-20	Mitigations for Impact E.J-1 1	The mitigation measures described above would further reduce the potential frequency of an accident involving this section of pipeline by defining the area as an HCA, which triggers increased requirements for inspection, testing, reporting, and public education, and reducing the potential consequences of an incident. For example, the installation of automatic isolation and check valves would automatically limit the potential duration of any fire. With the implementation of these measures, the potentially disproportionate impact on public safety for residents of this community would be reduced to levels commensurate with those for any other residential area located along the pipeline route. With the implementation of these measures, the environmental justice impact is reduced to a level that is less than significant.	The mitigation measures described above would further reduce the potential frequency of an accident involving this section of pipeline by defining the area as an HCA, which triggers increased requirements for inspection, testing, reporting, and public education, and reducing the potential consequences of an incident. For example, the installation of automatic isolation and check valves would automatically limit the potential duration of any fire. With the implementation of these measures, the potentially disproportionate impact on public safety for residents of this community would be reduced to levels commensurate with those for any other residential area located along the pipeline route. With the implementation of these measures, the environmental justice impact is reduced to a level that is less than significant.	1. The probability of a pipeline failure is equal along the entire pipeline and is extremely low, as discussed in the public safety and risk analysis portion of the document (Section 4.2). The potential "frequency" (implies periodic recurrence) of an accident is also not addressed by these measures and is falsely implied as written in the draft EISEIR. There would be neither a greater probability nor frequency of pipeline accidents in minority dominated areas versus non-minority areas.  2. SoCalGas has already proposed that the pipeline will be constructed to Class 3 design criteria, which is automatically designated an HCA area. SoCalGas will design, construct and operate the proposed facility in accordance with CPUC and DOT regulations. SoCalGas is subject to audits by DOT and CPUC to ensure compliance with the Integrity Management Program requirements specified in 49 CFR Part 192 Subpart O. SoCalGas does not agree with the DEISEIR interpretation of HCA requirements as they are presented and applied in the Environmental Justice analysis.

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See the response to Comment G484-165.

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4.19-13	Table 4.19-10	Impact EJ-1: Disproportionate Impact on Minority and Low-Income Community of a Pipeline Accident	There would be a permanent risk of a pipeline rupture that could cause a fire that would disproportionately adversely affect a minority community (Class II)	DELETE IMPACT: There would be a permanent risk of a pipeline rupture that could cause a fire that would disproportionately adversely affect a minority community (Class II)	The CPUC and DOT have exclusive jurisdiction over pipeline safety matters. SoCalGas operates in compliance with CPUC and DOT requirements, and presently implements a compliant Integrity Management Program that addresses identification and management of High Consequence Areas (HCAs). It is the pipeline operator's responsibility under 49 CFR Part 192 Subpart O to identify HCAs, not a regulatory agency's responsibility to predefine them. SoCalGas' pipeline system is constructed, operated and maintained similarly throughout SoCalGas' entire service territory regardless of individual demographic characteristics. In addition, the entire pipeline project will be constructed to meet Class 3 design criteria, which is a suitable level of design for a High Consequence Area. Consequently, the probability that a rupture and fire will occur at any single location is no greater in minority communities than at other locations along the route. Therefore, SoCalGas believes that there would be no disproportionate adverse effect on a minority community.
General					Need to add potential groundwater dewatering issues and need for an NPDES permit.
General					No discussion about water quality issues from run-off from construction in the "Impact Analysis and Mitigation" section. This is where the SWPPP should be introduced as a mitigation measure (instead of in the Hazardous Materials section 4.12).

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See the response to Comment G484-165.

G484-170

Sections 2.7.1.2 and 4.18.2 discuss groundwater dewatering and the need for a NPDES permit.

G484-171

Sections 2.7.1, 4.8.4, and 4.18.4 contain information on this topic.